

**RESPONSES TO AGENCY COMMENTS ON THE DRAFT WORK PLAN FOR WELL
DECOMMISSIONING, NAVAL STATION TREASURE ISLAND, SAN FRANCISCO, CALIFORNIA;
DATED: DECEMBER 2010**

The text below contains the responses to comments received from the Department of Toxic Substances Control (DTSC) on the "Draft Work Plan for Well Decommissioning, Naval Station Treasure Island, San Francisco, California", dated December 13, 2010. The comments addressed below were received from Ryan Miya, Senior Hazardous Substances Scientist, on January 24, 2011. In addition, Ross Steenson with the California Regional Water Quality Control Board, San Francisco Bay Region, reviewed the document but did not have comments.

General Comments:

1. The Navy should sample and analyze groundwater from at least one well for radiological contaminants (Radium-226 at a minimum) at each Site (Sites 10, 14, 22, 25, D1B, D4B and Building 180) before decommissioning in order to obtain data from each area regarding any potential radiological contamination.

RESPONSE 1: The Navy has conducted groundwater monitoring for radium as part of the ongoing groundwater monitoring program at Site 12, because solid waste disposal areas (SWDAs) at Site 12 have been associated with potential sources of radium in soil. Radium has been non-detect or detected at very low levels in the wells at Site 12. Groundwater at Site 12 has not exceeded screening level of 5 pCi/L for radium [Trevet Final 2009 Annual Groundwater Monitoring Report for IR Sites 12 and 6, October 2010]. Unlike Site 12, there are no source areas for radium in the areas where the well removals are proposed. Therefore the Navy does not plan to conduct groundwater sampling for radium prior to decommissioning the wells. The work plan was not changed as a result of this comment.

2. Figures 3 through 9 show the wells proposed for decommissioning at each site. However, these figures do not show the locations of other wells in the vicinity of the sites making it difficult to evaluate the adequacy of the remaining monitoring network. Please add the locations of all wells to the site-specific figures.

RESPONSE 2: The locations of other wells present in the vicinity of the wells proposed for decommissioning have been added to the figures.

3. Section 2.0 - Facility Description. Sections 2.1 through 2.7 provide background information for each site and the last paragraph summarizes the number of wells to be decommissioned. The second to the last paragraph of Section 2.3, Site D1B – 3rd Street Site, indicates that the Regional Water Quality Control Board concurred with the no further action

alternative proposed by the Navy and provides an important context and justification for the well decommissioning. In contrast, the last paragraph for all the other sections only summarize the number of proposed wells for decommissioning, but does not discuss the status or proposed plans for each site. Therefore, please describe the status and/or plans for each site at the end of each section.

RESPONSE 3: Additional text further describing the regulatory closure status of the sites discussed in Section 2 has been added. This work plan document provides a summary of the status of each site. For detailed discussion of the closure status of these sites, please refer to the referenced documents, and Site Management Plan.

4. Section 2.4 - Site D4B. The text indicates that "Site D4B included a former dry cleaning operation at Building 99." This section focuses on petroleum hydrocarbons, but the text does not discuss the potential release of volatile organic compounds (VOCs) from the former dry cleaning operation. Historic dry cleaning operations are commonly associated with VOC releases to soil, soil vapor, and groundwater. Please revise this section to include additional discussion about previous VOC analytical results at the site.

RESPONSE 4: There was no indication of VOC contamination documented in the investigations conducted. Distribution of chlorinated solvents at Site 24 suggests that the former dry cleaning facility (Building 99) is the most likely source of groundwater contamination Building 99 was used as a laundry and dry cleaning facility in the 1940s and 1950s (Tetra Tech 1999). Holes and trenches in the floors of these rooms may have been used to wash down solvents spilled during the dry cleaning process. The solvents probably drained to a sump beneath the building or directly to the ground. The types of solvents typically used in dry cleaning were PCE and TCE (Dames and Moore 1988). Information regarding the volume of solvents that may have been released to the ground is unknown.

For clarification, additional text was added at the end of the section to indicate that the Navy is conducting additional remedial action and monitoring in the vicinity of Site D4B for the groundwater VOC plume associated with Building 99 in Site 24 under the CERCLA program.

5. Section 4.2 - Well Decommissioning. An additional paragraph should be added to this section to address issues summarized in the California Department of Water Resources (DWR), Water Well Standards, Chapter II, Section 23, Requirements for Destroying Wells, F. Temporary Cover. Specifically, the following text should be included in the revised document: "During

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(CONTINUED)**

periods when no work is being done on the well, such as overnight or while waiting for sealing material to set, the well and surrounding excavation, if any, shall be covered. The cover shall be sufficiently strong and well enough anchored to prevent the introduction of foreign material into the well and to protect the public from a potentially hazardous situation."

RESPONSE 5: This text has been added. Anchoring will be accomplished using plywood, sand bags and bentonite.

6. Section 8 – Schedule. The text indicates that “The field work is scheduled to occur in January and February 2011.” In contrast, Figure 10 shows that field work is scheduled to start on 2/21/11 and finish on 3/8/11. The text and figures should be revised / updated for consistency.

RESPONSE 6: Figure 10 was correct. The text has been revised.

7. Table 1: Wells Proposed For Decommissioning. Table 1 lists common well and borehole parameters, but does not indicate whether the casing and/or screen is constructed of PVC, stainless steel or other materials. If the wells and/or screens are constructed of materials other than PVC, than the proposed hollow-stem auger method of over-drilling the borehole may not be suitable for decommissioning. Please modify the text and/or table to indicate the materials used to construct the wells and describe alternative decommissioning procedures, if applicable.

RESPONSE 7: All wells observed were constructed of PVC. A column has been added to the table to indicate the casing material type.

8. Appendix A - Well Decommissioning Log A new row or entry for the "Volume of borehole to be grouted" should be added to the Original Well Data section. This additional information will facilitate a quick comparison of estimated borehole volume versus actual grout volume and help to identify potential problems or discrepancies during the field operations.

RESPONSE 8: The column has been added to the log.

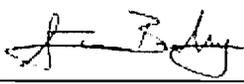
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